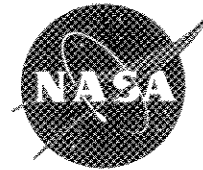


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

October 13, 2010



General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the
Maryland Space Business Roundtable (MSBR) Annual Gala
Dinner on October 15, 2010

On October 15, 2010, the Maryland Space Business Roundtable (MSBR), a non-profit organization under 501(c)(3) of the Internal Revenue Code, is hosting an Annual Gala Dinner at Martin's Crosswinds in Greenbelt, MD at 6 p.m. There will be speakers at the dinner from NASA and Congress as well as a presentation by The Capitol Steps.

Approximately 450 people have been invited to attend, which includes 200 NASA personnel. The estimated cost of all food and refreshments is \$57.00 per person. The Dinner will be attended by Congressmen and staffers, state and local officials, industry representatives, members of the public and media, and personnel from NASA, NOAA, DoD and other Federal Agencies.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs and operations. Attendees will have an opportunity to exchange information regarding various NASA programs.

NASA employees whose duties do not substantially affect MSBR, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and their invited guests for free attendance to the event. However, NASA employees whose duties may substantially affect the MSBR, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

In addition, we note that there will be a Silent Auction. NASA employees are reminded that, as Federal employees, they should not participate in the Silent Auction or other fundraising aspect of this event.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone